

Defendants AEU BENEFITS, LLC, and AEU HOLDINGS, LLC (together, “AEU”), hereby move this Court for the entry of a HIPAA Qualified Protective Order (“Motion”). In support of this Motion, AEU states as follows:

1. In the ordinary course of their businesses, several parties to this litigation had access to and/or received protected health information (“PHI”) that they are required to confidentially maintain pursuant to the Health Insurance Portability and Accountability Act of 1996 and corresponding privacy rules (“HIPAA”).

2. The Parties have exchanged written discovery requests that implicate the disclosure of PHI, as well as other confidential and/or sensitive personal information.

3. The Parties have engaged in communications regarding the substance of a HIPAA Qualified Protective Order, ultimately reaching an agreement as to terms and reflecting those terms in the attached **Exhibit A** (“Proposed HIPAA Order”). A copy of the Proposed HIPAA Order will be submitted to Your Honor’s proposed order inbox in Word format. For the Court’s convenience, a redline comparing the Proposed HIPAA Order to the model order provided on the Northern District of Illinois website is attached hereto as **Exhibit B**.

4. Entry of the Proposed HIPAA Order will facilitate the Parties’ document productions and ensure that PHI and other sensitive information remains confidential in compliance with the Parties’ HIPAA obligations.

WHEREFORE, AEU respectfully requests that this Court enter the Proposed HIPAA Order.

November 18, 2019

Respectfully submitted,

*s/Tiffany S. Fordyce*_____

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Benefits, LLC*

CERTIFICATE OF SERVICE

I, Tiffany S. Fordyce, hereby certify that on November 18, 2019, I caused the foregoing **AEU HOLDINGS, LLC and AEU BENEFITS, LLC'S AGREED MOTION FOR ENTRY OF HIPAA QUALIFIED PROTECTIVE ORDER** to be filed and served through the Northern District of Illinois CM/ECF electronic filing system on all counsel of record for all other parties.

s/Tiffany S. Fordyce
Tiffany S. Fordyce